

JACQUES G. BRONZE, ESQ.

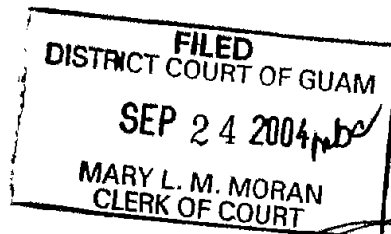
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RICHARD A. PIPES, ESQ.

LAW OFFICES OF RICHARD A. PIPES

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Attorneys for Defendant Hongkong and Shanghai Banking Corporation, Ltd.

DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**DECLARATION OF JACQUES G.
BRONZE IN SUPPORT OF *EX*
PARTE APPLICATION AND
CONSENT OF LOCAL COUNSEL
TO ACT AS CO-COUNSEL**

I, the undersigned hereby state and depose as follows:

1. That I am an active member and in good standing of the bar of the above entitled court. My Bar No. is 96003.

ORIGINAL

2. That I hereby consent to act as local counsel and co-counsel for Peter S. Modlin of the Law Firm of Farella Braun & Martel LLP, in connection with the above-referenced action. The basis for filing this Motion for *Ex Parte* is the fact that Mr. Modlin will be involved in a motion to reconsider which will be filed on Wednesday, September 29, 2004.

3. I agree to act as local counsel so that service of papers may be made upon my office and the Law Firm of Farella Braun & Martel LLP. My address and phone numbers is contained on the first page of this document.

4. On September 22, 2004, I faxed a letter to Anita P. Arriola, attorney for Plaintiffs, regarding this *Ex Parte* Application for Admission *Pro Hac Vice*. A true and correct copy of the letter is attached hereto as Exhibit "1." Attorney Arriola did respond to my letter and had no objections subject to the limitation placed in her letter. A true and correct copy of the letter is attached hereto as Exhibit "2." HSBC does not waive any arguments raised in its appeal to a federal judge relating to the modification of the scheduling order. Mr. Modlin was never an issue in that appeal.

5. I understand the obligations assigned to me as local counsel pursuant to the Rules of Court.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED on this 24th day of September 2004.



JACQUES G. BRONZE

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JACQUES G. BRONZE
JERRY J. TANG

TELEPHONE: (671) 646-2001
TELECOPIER: (671) 647-7671

September 22, 2004

VIA: FACSIMILE
(671) 477-9734

CONFIRMED

Anita P. Arriola, Esq.

ARRIOLA, COWAN & ARRIOLA

Suite 201, C&A Professional Bldg.

259 Martyr Street

Hagåtña, Guam 96910

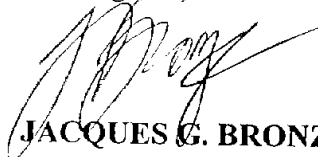
Re: Sadhwani, et al. v. HSBC, et al.; Civil Case No. 03-00036

Dear Anita:

On Friday, September 24, 2004, HSBC will be filing an *Ex Parte* Application for Admission *Pro Hac Vice* of Peter S. Modlin from the firm of Farella Braun & Martel LLP, located in San Francisco, California. Pursuant to Local Rule 7.1(j), please be advised that we will be submitting an *ex parte* application and declaration in support of the proposed order granting the application. We do not know when the *ex parte* application will be heard by the Court but we will advise your office as soon as we know. Please advise if you have any objection to my *Ex Parte* Application. If you do not, I will assume that you do not wish to be present at a hearing on this matter. If this assumption is incorrect, please contact me by 12:00 noon, Friday, September 24, 2004.

Please feel free to contact me if you have any questions regarding the above matter.

Best regards,


JACQUES G. BRONZE

cc: *Mr. C. Underwood

JGB:tc

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EXHIBIT 1

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TELEPHONE No.: (671) 646-2001

FACSIMILE No.: (671) 647-7671

~ ~ **FACSIMILE TRANSMITTAL SHEET** ~ ~

Date: September 22, 2004
To: Anita P. Arriola, Esq.
Firm: **ARRIOLA, COWAN & ARRIOLA**
Fax No: 477-9734
From: Jacques G. Bronze, Esq.
Subject: Sadhwani, et al. v. HSBC, et al.; Civil Case No. 03-00036

Sending 2 page(s) including cover sheet.

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MESSAGE:

PLEASE SEE ATTACHED DOCUMENT(S) IN CONNECTION WITH THE ABOVE-REFERENCED MATTER:

Letter of even date.

Fax Sent By: tony camacho

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FAX/TEL No: (671) 647-7671

FACSIMILE TRANSMITTAL SHEET

Date: September 22, 2004
To: Anita P. Ariola, Esc.
From: ARRIOLA, COWAN & ARRIOLA
Fax No: 477-9734
From: Jacques G. Bronze, Esq.
Subject: Sodhwani, et al. v. HSEC, et al.; Civil Case No. 03-00036

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Fax Sent By: tony camacho

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MP: Multi-Poll
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PD: Polled by Remote
PG: Polling a Remote
DR: Document Removed
FO: Forced Output

MB: Receive to Mailbox
PI: Power Interruption
TM: Terminated by user
WT: Waiting Transfer

Law Offices

Arriola, Cowan & Arriola

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Mark E. Cowan
Anita P. Arriola
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E-mail: acalaw@netpci.com

Jacqueline T. Terlaje

September 23, 2004

VIA FACSIMILE: (671) 647-7671

Jacques G. Bronze, Esq.
Bronze & Tang, P.C.
2nd Floor, BankPacific Building
825 S. Marine Drive
Tamuning, Guam 96913

Re: Sadhwani et al. v. Hongkong Shanghai Banking Corporation, Ltd., et.al,
District Court of Guam, Civil Case No. CV03-00036

Dear Jacques:

This is to inform you that I do not oppose the Ex Parte Application for Admission *Pro Hac Vice* of Peter S. Modlin unless his late appearance in the case will be used by HSBC to attempt to modify, extend or continue the trial date or any other deadlines contained in the Stipulation and Order Extending Scheduling Order. Accordingly, please inform the Court in your Certificate of Counsel of those grounds for my opposition. I wish to be present at any hearing on the ex parte application.

Very truly yours,


ANITA P. ARRIOLA

EXHIBIT

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